



UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
DENNIS ROSS,  
  
Defendant.

CASE NO. 3:24-mj-05318  
  
COMPLAINT for VIOLATION  
Title 18 U.S.C § 2252(a)(4)(B), (b)(2)

16 Before the Honorable Theresa L. Fricke, United States Magistrate Judge, United  
17 States Courthouse, Tacoma, Washington.

18 The undersigned complainant being duly sworn states:

19 **COUNT ONE**

20 **(Possession of Child Pornography)**

21 Beginning on a date unknown but continuing until on or about December 12,  
22 2023, in Lewis County, within the Western District of Washington, and elsewhere,  
23 DENNIS ROSS knowingly possessed, and attempted to possess, matter that contained  
24 any visual depiction—the production of which involved the use of a minor engaging in  
25 sexually explicit conduct and such visual depiction was of such conduct—that was  
26 mailed and shipped and transported using any means and facility of interstate and foreign  
27 commerce and in and affecting interstate and foreign commerce and that was produced

1 using materials that had been so mailed and shipped and transported by any means,  
2 including by computer, and any visual depiction involved in the offense involved a  
3 prepubescent minor and a minor who had not attained 12 years of age.

4 All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and  
5 2252(b)(2).

6 And the complainant states that this Complaint is based on the following  
7 information:

8 I, Special Agent Kaleb Roberts, being duly sworn under oath, depose and say:

9 **INTRODUCTION**

10 1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and  
11 have been since January 2020. I am currently assigned to the Seattle Division’s Olympia  
12 Resident Agency. Since joining the FBI, I have been trained in interview and  
13 interrogation techniques, investigative techniques, legal concepts and evidence collection  
14 and preservation. In my duties as a special agent, I have been involved in investigations  
15 of transnational organized crime, violent gangs, international and domestic terrorism,  
16 weapons of mass destruction, public corruption, fraud, conspiracy, computer intrusion,  
17 human trafficking, and crimes against children. I have participated in the execution of  
18 search warrants involving child pornography, fraud, drug or computer related offenses,  
19 and the search of digital devices. I have conducted investigations into violations relating  
20 to child exploitation and child pornography, including violations pertaining to the illegal  
21 receipt and possession of child pornography, and material involving the sexual  
22 exploitation of minors in violation of 18 U.S.C. §§ 2252 and 2252A.

23 2. I am familiar with and have participated in a variety of investigative  
24 techniques including but not limited to surveillance, interviewing of witnesses/suspects,  
25 and the execution of search and seizure warrants that involved child exploitation and/or  
26 child pornography offenses, and the search and seizure of computers and other digital  
27 devices.

1           3.       The facts set forth in this Complaint are based on my own personal  
2 knowledge; knowledge obtained from other individuals participating in this investigation,  
3 including other law enforcement officers; review of documents and records related to this  
4 investigation; communications with others who have personal knowledge of the events  
5 and circumstances described herein; and information gained through my training and  
6 experience. I have not set forth all facts known to me as a result of this investigation but  
7 only those facts I believe necessary to establish probable cause to conclude that DENNIS  
8 ROSS committed the offense charged in this Complaint.

9                               **SUMMARY OF THE INVESTIGATION**

10           4.       In May 2010, DENNIS ROSS was convicted in the United States District  
11 Court for the Eastern District of Virginia of Receipt of Child Pornography in violation of  
12 18 U.S.C. § 2252(a)(2). The Court sentenced ROSS to 5 years of imprisonment and a 25-  
13 year term of supervised release.

14           5.       ROSS left Bureau of Prisons (BOP) custody in October 2014 and as required  
15 by Virginia law, began registering as a sex offender. In August 2018, U.S. Probation filed  
16 a petition alleging ROSS violated the terms of his supervision. ROSS absconded from  
17 supervision before that matter could be resolved.

18           6.       In October 2022, the district court in the Eastern District of Virginia issued  
19 a warrant for ROSS's arrest for his failure to maintain current sex offender registration in  
20 violation of SORNA.

21           7.       On December 12, 2023, federal agents arrested ROSS in Lewis County,  
22 Washington, after locating him at the home of his girlfriend's aunt, B.S.

23           8.       After his arrest, B.S. told the investigating deputy marshal that she had a  
24 computer and hard drive ROSS used frequently while living at her home in Lewis County.  
25 She described ROSS as using that laptop all the time. B.S. provided these items to federal  
26 agents, and they applied for a search warrant in the Eastern District of Virginia. The initial  
27 crime under investigation was a violation of SORNA. But during the search, law

1 enforcement located suspected child sexual abuse material, stopped the search, and then  
2 applied for a second warrant to search for evidence of offenses related to child sexual abuse  
3 material.

4 9. The forensic examination of the laptop revealed the operating system was  
5 Windows 11 with the listed owner as Chuck Richardson. The most recent install/update  
6 date for the operating system was January 6, 2023. And the laptop was last shut down on  
7 December 14, 2023. Law enforcement also located significant electronic information  
8 suggesting ROSS was the person using the laptop, including:

- 9 • Credit card information associated with an account ending 6065 and in the  
10 name of Dennis Ross.
- 11 • Multiple invoices from GAMER2GAMER GLOBAL PTE LTD, a company  
12 based out of Singapore. These invoices were addressed to “dennis ross” at an  
13 address in Suffolk, VA.
- 14 • Hotel invoices for two hotels in Maine reflecting stays in June and July 2022.  
15 Both invoices are to Dennis Ross with an address in Suffolk, VA.
- 16 • The email account edcamino@outlook.com was also associated with the  
17 laptop. Among the email correspondence in this account was exchanges with  
18 GAMER2GAMER GLOBAL PTE LTD, Etsy, Norton LifeLock Inc., PayPal,  
19 and Hilton. The messages suggest someone named Dennis Ross was the  
20 person using the account.

21 10. The manufacturer’s label on the laptop showed it was made in China.

22 11. In addition, agents recovered approximately 150 images of suspected child  
23 sexual abuse material. I reviewed these images and described three below:  
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25  
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1 File 1: index29.jpg,

2 Last Modified Date: 11/15/2021

3 Last Accessed Date: 12/9/2023

4 Description: This image depicts a nude prepubescent female with an adult male  
5 vaginally penetrating her with his erect penis. Based on her youthful appearance,  
6 lack of pubic/body hair, and lack of pubic/muscular development, I estimate the  
7 child victim is between four and six years of age.

8  
9 File 2: index9.jpg

10 Last Modified Date: 11/14/2021

11 Last Accessed Date: 12/9/2023

12 Description: This image depicts a prepubescent female wearing a cat costume and  
13 laying on a bed. The costume is pulled up, and an adult male is penetrating the  
14 child victim's vagina with his erect penis. Based on her small stature, lack of  
15 pubic/body hair, and lack of pubic/muscular development, I estimate the child  
16 victim is between five and six years of age.

17  
18 File 3: index16.jpg

19 Last Modified Date: 11/14/2021

20 Last Accessed Date: 12/9/2023

21 Description: This image depicts a prepubescent female laying on a bed. An adult  
22 male penis is in her mouth, and another adult male is penetrating her vagina with  
23 his erect penis. Based on her youthful appearance, lack of pubic/body hair, and  
24 lack of muscular/pubic development, I estimate the child victim is between seven  
25 and eight years of age.

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27 //

**CONCLUSION**

12. Based on the above facts, I respectfully submit that there is probable cause to believe that DENNIS ROSS committed the offense(s) charged in this Complaint.

*Kaleb Roberts*

KALEB ROBERTS, Affiant  
Special Agent, FBI

The above-named affiant provided a sworn statement attesting to the truth of the foregoing this 1st day of October, 2024.

*Theresa L. Fricke*

THERESA L. FRICKE  
United States Magistrate Judge